

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In Re:

Asher Bobea and Maria Navarro

Case No.:

19-21706

Chapter:

13

Judge:

SLM

**NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY**

Asher Bobea and Maria Navarro debtors and defendants, in this case proposes a compromise, or to settle a claim and/or action as described below. If you object to the settlement of compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later than 7 days before the hearing date.

Address of the Clerk:

50 Walnut Street  
Newark, NJ 07102

If an objection is filed, a hearing will be held before the Honorable Stacey L. Meisel on 5/13/2020 at 10:00 a.m., at the United States Bankruptcy Court, courtroom no. 3A, MLK US Courthouse, 50 Walnut Street, Newark, NJ 07102 (hearing to be scheduled for at least 28 days from the date of the filing of the notice). If no objection is filed the clerk will enter a *Certification of No Objection* and the settlement may be completed as proposed.

Nature of action: Nondischargeability pursuant to 11 U.S.C. §§523(a)(2)(A), 523(a)(2)(B), 523(a)(4), , fraud, breach of contract, account stated, book account, bad faith, fraudulent conveyance; unjust enrichment, quantum meruit, declaratory judgment, piercing of the corporate veil/alter ego, successor liability, tortious interference.

Pertinent terms of settlement:

Debtors shall pay directly within thirty (30) days of the approval of this Settlement the sum of \$5000 to the Plaintiff. The balance of the claim, \$47,747.95 plus counsel fees to the Plaintiff's attorney of \$15,000 shall be paid through an Amended Chapter 13 Plan. Debtors shall consent to a non-dischargeability judgment which shall be vacated on the successful completion of the Debtors' Plan. Debtors shall execute a promissory note to the Plaintiff in the amount of \$47,747.95, which note shall be secured by a mortgage on the Debtors' primary residence and a lien on all vehicles.

Objections must be served on, and request for additional information directed to:

Name: Scott J Goldstein

Address: Law Office of Scott J Goldstein LLC  
280 West Main Street, Denville, NJ 07834

Telephone No.: (973) 453-2838